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\$O ORDERED

April 17, 2008

VIA FACSIMILE

Honorable George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 630
New York, NY 10007

George B. Daniels
HON. GEORGE B. DANIELS

APR 17 2008

Re: Barbara Broughel v. The Battery Conservancy, et al., 1:07-cv-7755

Dear Judge Daniels:

I am counsel for the Plaintiff Barbara Broughel.

On April 17, 2008, I wrote to the Court requesting an extension to file a reply on Plaintiff's Motion for Summary Judgment until May 2, 2008, based on personal and professional reasons, including a long ago planned trip out of town from early Friday morning until Thursday morning of next week.

I had extended the same courtesy to the Defendants Conservancy and Warrie Price stipulating to a two-week extension to reply on their motion for judgment on the pleadings, which has already been approved by your Honor.

The same courtesy was extended subject to your approval to Defendant Weisz + Yoes based on their attorney's representation that he would be out of town next week and would not be able to respond and his representation that he would rely exclusively on the papers filed by the Defendant Conservancy, thus not interfering with our Court date of May 15, 2008.

Unfortunately, on returning to my office this morning, I learned that the team of lawyers representing the Conservancy will not accord me the same courtesy based on "significant inconvenience to us in terms of our professional obligations." This, despite the fact that all of their papers on all of the outstanding motions will be submitted by April 21, and the fact that under normal circumstances my last papers would have been filed on May 9, 2008.

Therefore, I respectfully request that the Court order that the Plaintiff's time to reply on her motion for a preliminary injunction due on April 21 be extended until May 2, 2008.

Respectfully submitted,


Barbara Hoffman

cc: Margaret Pfeiffer, Esq. (via facsimile)
Jarrett M. Behar, Esq. (via facsimile)
Barbara Broughel (via email)